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OFFICE OF THE GENERAL COUNSEL
SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT
DAPHNE P. HSU, SBN 247256
PRINCIPAL DEPUTY DISTRICT COUNSEL
21865 Copley Drive
Diamond Bar, California 91765
TEL: 909-396-3400 • FAX: 909-396-3458

SOUTH COAST AQMD
CLERK OF THE BOARDS

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Attorney for Petitioner
South Coast Air Quality Management District

BEFORE THE HEARING BOARD OF THE
SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT

In the Matter of
SOUTH COAST AIR QUALITY
MANAGEMENT DISTRICT,

Petitioner,

vs.

REAL PLATING, INC.,

[Facility ID No. 152443]

Respondent.

CASE NO. 6218-1

PETITION FOR ORDER FOR ABATEMENT

District Rules 201, 203, 1426

Hearing Date: January 19, 2022

Time: 9:00 a.m.

Place: Hearing Board

South Coast AQMD

21865 Copley Drive

Diamond Bar, CA 91765

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT (hereinafter referred to as "District" or "Petitioner" or "South Coast AQMD") petitions the Hearing Board (hereinafter referred to as "Hearing Board") for an Order for Abatement directed to Respondent Real Plating, Inc. (hereinafter referred to as "Respondent" or "Real Plating") with a facility located at 1245 West 2nd Street Pomona, CA 91766. The District alleges as follows:

1. Petitioner is a body corporate and politic established and existing pursuant to California Health and Safety Code § 40000, *et seq.* and § 40400, *et seq.*, and is the sole and exclusive local

1 agency with the responsibility for comprehensive air pollution control in the South Coast Basin.

2 2. Respondent operates a metal plating facility (Facility ID No. 152443) located at 1245
3 West 2nd Street Pomona, CA 91766 (the "Facility"), within the jurisdiction of the District.

4 3. **District Rule 201** provides, in relevant part, that a "person shall not build, erect, install,
5 alter or replace any equipment . . . the use of which may cause the issuance of air contaminants or the
6 use of which may eliminate, reduce or control the issuance of air contaminants without first obtaining
7 written authorization for such construction from the Executive Officer."

8 4. **District Rule 203(a)** provides, in relevant part, a "person shall not operate or use any
9 equipment . . . , the use of which may cause the issuance of air contaminants, or the use of which may
10 reduce or control the issuance of air contaminants, without first obtaining a written permit to operate
11 from the Executive Officer"

12 5. **District Rule 219(p)(23)** provides:

13 Notwithstanding the exemptions in subdivision (p), equipment existing as
14 of May 5, 2017 that is subject to the aforementioned exemptions and that is
15 an integral part of an operation requiring a written permit shall continue to
16 be exempt, provided the equipment is identified, described in detail and
17 submitted for inclusion into the permit equipment description with any
18 associated application for Permit to Construct or Permit to Operate.
Equipment described in this paragraph includes, but is not limited to, rinse
tanks, dye tanks and seal tanks that are part of a metal finishing operation,
including but not limited to plating, anodizing and surface preparation.

19 6. **District Rule 1426(g)** provides in relevant part:

20 (1) An owner or operator of a Metal Finishing facility with an Ampere-hour
21 meter equipped at a Process Tank shall record the actual cumulative rectifier
22 usage for each calendar month and the total for each calendar year.

23 (4) An owner or operator of a Metal Finishing facility shall maintain records
24 demonstrating compliance with the requirements of subdivisions (e) and (f)
25 and paragraphs (g)(1) and (g)(2).

26 (5) All records shall be maintained for at least five years; at least the two
27 most current years shall be kept on site.

28 7. On multiple occasions, including most recently on June 10, 2021, South Coast AQMD

inspected Real Plating. On June 10, 2021, Inspector Ricky Dhupar observed Real Plating commit the following violations:

Rule Nos.	Violations
201, 203(a)	Operating tanks without permits, including the following tanks: <ul style="list-style-type: none">• Tank 49 - Blue Dye• Tank 18 - Chem-Cel Anoseal• Tank 32 - Hard Sulfuric Acid Anodize• Tank 34 - Muriatic Acid• Tank 31 - Clear Zinc Chromate Trivalent Chrome• Tank 27 - Yellow N Chromate• Tank 21 - Yellow N Chromate• Tank 24 and bucket - AL Chrome• Tank 19 - Black Zinc Chromate• Tank 52 - Red Dye• Tank 56 - Metallast• Tank 12 - Bifluoride
201, 203(a)	Operating tanks without permits or being identified in an existing permit, including the following tanks: <ul style="list-style-type: none">• Tank 26 - Yellow N Rinse• Tank 29 - Tri Chrome B2 Rinse• Tank 22 - Yellow N Rinse• Tank 20 - Black Chromate Rinse• Tank 14 - Black Dye Rinse• Tank 16 - Anoseal Rinse• Tank 17 - Hot DI Water• Tank 25 - Hot DI Water• Tank 28 - Alkaline Zinc Rinse• Tank 30 - Chloride Zinc Rinse• Tank 35 - Muriatic Acid Rinse• Tank 37 - Electrocleaner Rinse• Tank 48 - Collect Rinse• Tank 50 - Waste Water
201, 203(a)	Tanks identified by facility as being on-site, not identified in an existing permit, including the following tanks: <ul style="list-style-type: none">• Tanks 1, 4, 5 listed as "Rinse Water"

	<ul style="list-style-type: none"> • Tanks 7, 51 listed as "Rinse" • Tank 23 listed as "Chrome Rinse" • Tank 40 listed as "Cadmium Rinse" • Tank 42 listed as "Tin Plating" • Tank 53 listed as "Gold Dye" • Tank 54 listed as "Purple Dye" • Tank 55 listed as "Gold Dye"
203(b)	<p>Violating conditions in its permits:</p> <ul style="list-style-type: none"> • <u>Permit to Operate G38175</u> Conditions 1, 3A, 3C, 5, 7A, 7B, 7C • <u>Permit to Operate G49944¹</u> Conditions 3A, 4, 5, 9, 13, 14
1426(g)(1) (g)(4), (g)(5)	<ul style="list-style-type: none"> • Failing to record the actual cumulative rectifier usage for each calendar month and the total for each calendar year • Failing to maintain records demonstrating compliance with subdivisions (e) and (f) and paragraphs (g)(1) and (g)(2) • Failing to maintain records for at least five years with at least the two most current years onsite

8. Inspector Dhupar observed the following tanks:

- a. Tank 49 - Blue Dye;
- b. Tank 18 - Chem-Cel Anoseal;
- c. Tank 32 - Hard Sulfuric Acid Anodize;
- d. Tank 34 - Muriatic Acid;
- e. Tank 31 - Clear Zinc Chromate Trivalent Chrome;
- f. Tank 27 - Yellow N Chromate;
- g. Tank 21 - Yellow N Chromate;
- h. Tank 24 and bucket - AL Chrome;
- i. Tank 19 - Black Zinc Chromate;
- j. Tank 52 - Red Dye;
- k. Tank 56 - Metallast; and

¹ Attached as Exhibits A and B are Permits to Operate G38175 and G49944, respectively.

1 l. Tank 12 – Bifluoride.

2 These tanks were not in any permitted tank line and thus, the District alleges that Real Plating is in
3 violation of Rules 201 and 203(a).

4 9. Inspector Dhupar observed the following tanks:

- 5 a. Tank 26 - Yellow N Rinse;
- 6 b. Tank 29 Tri Chrome B2 Rinse;
- 7 c. Tank 22 - Yellow N Rinse;
- 8 d. Tank 20 - Black Chromate Rinse;
- 9 e. Tank 14 - Black Dye Rinse;
- 10 f. Tank 16 - Anoseal Rinse;
- 11 g. Tank 17 - Hot DI Water;
- 12 h. Tank 25 - Hot DI Water;
- 13 i. Tank 28 - Alkaline Zinc Rinse;
- 14 j. Tank 30 - Chloride Zinc Rinse;
- 15 k. Tank 35 - Muriatic Acid Rinse;
- 16 l. Tank 37 - Electrocleaner Rinse;
- 17 m. Tank 48 - Collect Rinse; and
- 18 n. Tank 50 - Waste Water.

19 Each and every one of these tanks appear to be an integral part of the plating operations described in
20 either Permit G38175 or Permit G49944, however these tanks were not identified, described in detail
21 and submitted for inclusion into the permit equipment description for Permit G38175 or G49944 as
22 required by Rule 219(p)(23). Thus, the District alleges that Real Plating is in violation of Rules 201
23 and 203(a).

24 10. The facility provided a tank inventory document, which further identified the following
25 tanks that are not permitted in any tank line:

- 26 a. Tanks 1, 4, 5 listed as "Rinse Water";
- 27 b. Tanks 7, 51 listed as "Rinse";

- c. Tank 23 listed as "Chrome Rinse";
- d. Tank 40 listed as "Cadmium Rinse";
- e. Tank 42 listed as "Tin Plating";
- f. Tank 53 listed as "Gold Dye";
- g. Tank 54 listed as "Purple Dye"; and
- h. Tank 55 listed as "Gold Dye".

These tanks were not in any permitted tank line and thus, the District alleges that Real Plating is in violation of Rules 201 and 203(a).

11. Inspector Dhupar observed the sulfuric acid anodizing line (Permit G38175) and observed that the facility was not in compliance with conditions numbers 1, 3A, 3C, 5, 7A, 7B, and 7C.

- a. Condition 1 – Facility was operating contrary to the specifications submitted within the application for which the permit is issued.
- b. Condition 3A – Facility's tanks were not clearly labeled with the appropriate tank numbers as designated in the equipment description.
 - i. Tanks 2, 5, 15 and 16 were labeled with tank numbers and/or descriptions contrary to the permit.
- c. Condition 3C – Facility was air-sparging and heating tanks that were not specifically identified to be air-sparged or heated.
 - i. Tank 16, Aluminum Anodize Seal (mis-labeled as Tank 15) was air sparging, but Tank 16 is not specifically identified in the equipment description to be air sparged.
- d. Condition 5 – Condition 5 required the facility to weigh parts before each batch is processed in these tanks and maintain the information in a daily log. Facility failed to weigh material processed through any tank containing Nitric Acid (Tank 5) and log daily total weight (in pounds) processed from August 2019 to present.
- e. Condition 7A – Failed to maintain the concentration (in percent by weight) of each

chemical in each tank identified in condition number 6.

f. Condition 7B – Failed to provide Safety Data Sheets (SDS) for all materials in each process tank.

g. Condition 7C – Failed to maintain the following records required by permit conditions:

i. Records of the weight of materials processed in any tank containing nitric acid as required by condition 5.

ii. Records for concentration (in percent by weight) for each chemical identified in condition 6.

iii. Ampere-hours used on Tank 9.

12. Thus, the District alleges that Real Plating is in violation of Rule 203(b) for not abiding by the conditions in Permit G38175.

13. Inspector Dhupar observed the sulfuric acid anodizing line (Permit G49944) and observed that the facility was not in compliance with conditions numbers 3A, 4, 5, 9, 13, and 14.

- a. Condition 3A – Facility's tanks were not clearly labeled with the appropriate tank number as designated in the equipment description. Tanks 33, 35, 38, and 42 were labeled with tank numbers and/or descriptions contrary to the permit.
- b. Condition 4 – Facility's rectifiers were not identified or clearly labeled.
- c. Condition 5 – Failed to equip the rectifier for Tank 33 with continuous recording, non-resettable, totalizing ampere-hour meter which operate on the electrical power line(s) connected to each tank, where a separate meter was hard wired for each tank.
- d. Condition 9 – Failed to record ampere-hour usage for Tanks 33, 38, and 42, the cumulative monthly ampere-hour readings and total ampere-hours to date in given calendar year for each tank.
- e. Condition 13 – Failed to provide Safety Data Sheets (SDS).
- f. Condition 14 – Failed to maintain records required by the conditions of this permit and at least once a month, chemical concentrations, in percent by weight, of each

chemical in each tank of this permit.

14. Thus, the District alleges that Real Plating is in violation of Rule 203(b) for not abiding by conditions in Permit G49944.

15. Inspector Dhupar requested records required by the permit conditions and applicable Rule 1426 requirements through issuance of Notices to Comply. The facility failed to provide the following:

16. Daily log of weighed parts for Tank 5 (deoxidizer) as required by Permit to Operate G38175, Condition 5 for years 2020 and 2021.

a. Concentration (in weight percent) of all chemicals within each tank for all tanks on-site.

b. Records of ampere-hour usage for Tanks 33, 38, and 42, the cumulative monthly ampere-hour readings and total ampere-hours to date in given calendar year for each tank for years 2019, 2020, and 2021.

c. Safety Data Sheets (SDS) for all materials charged to each process tank.

17. Thus, the District alleges that Real Plating is in violation of Rule 203(b) for failure to abide by the permit conditions in Permit G38175 and Rule 1426.

18. Therefore, Petitioner alleges that Respondent is in violation of District Rules 201, 203(a), 203(b), and 1426(g) and seeks an Order for Abatement.

19. It is not unreasonable to require Respondent to comply with District rules and its permit.

20. The issuance of the prayed for Order for Abatement is not expected to result in the closing or elimination of an otherwise lawful endeavor, but if it does result in such closure or elimination, it would not be without a corresponding benefit in reducing air contaminants.

21. An Order for Abatement is not intended to be, nor will it act as, a variance.

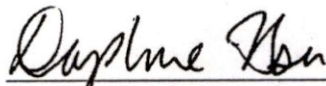
22. An Order for Abatement, upon a fully noticed hearing, will not constitute a taking of property without due process of law.

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1 Dated: December 7, 2021

2 SOUTH COAST AIR QUALITY
3 MANAGEMENT DISTRICT

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5 DAPHNE P. HSU
6 Principal Deputy District Counsel
7 Attorney for Petitioner
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EXHIBIT A



South Coast Air Quality Management District
21865 Copley Drive, Diamond Bar, CA 91765-4178
PERMIT TO OPERATE

page 1
Permit No.
G38175
A/N 521730

LEGAL OWNER
OR OPERATOR:

REAL PLATING, INC.
1245 W. 2ND STREET
POMONA, CA 91766-1310

ID 152443

Equipment Location: 1245 W. 2ND STREET, POMONA, CA 91766-1310

Equipment Description:

Sulfuric Acid Anodizing Line, consisting of:

1. Tank No. 2, Hot Soak, Aluminum Cleaning, Borax Pentahydrate, Tetrasodium Pyrophosphate, Sodium Nitrate, Sodium Alkylaryl Sulfonate, Surfactant, Heated.
2. Tank No. 3, Aluminum Caustic Etch, Sodium Hydroxide, Heated.
3. Tank No. 5, Deoxidizer, Sulfuric Acid, Nitric Acid, Unheated.
4. Tank No. 9, Sulfuric Anodize, Anodizing, Sulfuric Acid, Aluminum, Type II, with Certified Fume Suppressant, Rectified (Maximum 3000 Amperes Rectifier), Air Sparged, and Unheated.
5. Tank No. 15, Black Dye, US Specialty Dye, Chromium (III), Air Sparged, Heated.
6. Tank No. 16, Aluminum Anodize Seal, Nickel Acetate Tetrahydrate, Heated.
7. Associated Loading, Unloading, Dragout, Drying, and Rinse Tanks, Heated and Unheated.

Conditions:

1. Operation of this equipment shall be conducted in accordance with all data and specifications submitted with the application under which this permit is issued, unless otherwise noted below.
2. This equipment shall be properly maintained and kept in good operating condition at all times.
3. This permit is subject to the following requirements:
 - A. All tanks shall be clearly identified and labeled with the appropriate tank no. as designed in the equipment description. The identification and/or labeling of each tank shall be directly affixed to the tank, and shall be easily readable.

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PERMIT TO OPERATE

CONTINUATION OF PERMIT TO OPERATE

- B. Tanks in this line shall only contain the chemicals and compounds specifically identified in the equipment description of this permit. No chemical compounds listed in Rule 1401, Table 1 "Toxic Air Contaminants", as amended September 10, 2010, other than those included in the equipment description on this permit, shall be used in this equipment.
- C. Air sparging, rectification, and/or heating shall not be conducted except in tanks where these operations are specifically identified in the equipment description. Removal of such equipment shall not constitute a modification for permitting purposes.
4. The operator shall maintain the facility in compliance with the housekeeping and recordkeeping requirements of Rule 1426.
5. The total amount of material processed through any tank containing nitric acid (Tank No. 5) shall not exceed 1296 pounds in any one day. To demonstrate compliance with this condition, the operator shall weigh the parts before each batch is processed in these tanks, and shall maintain this information in a daily log.
6. The open process tanks in this line shall be operated at or below the parameter limits in the following table:

Tank Nos.	Chemical	Maximum Chemical Concentration (Percent by Weight)	Maximum Annual Ampere-Hours (Per Calendar Year)	Maximum Operating Temperature (Degrees F)
2	Borax Pentahydrate	2.14	n/a	140
	Tetrasodium Pyrophosphate	1.56		
	Sodium Nitrate	0.45		
	Sodium Alkylaryl Sulfonate	0.22		
3	Sodium Hydroxide	6.7	n/a	150
5	Sulfuric Acid	1.59	n/a	AMB
	Nitric Acid	3.18		
9	Sulfuric Acid	19.0	21,840,000	AMB
15	Chromium (III)	0.0005	n/a	150
16	Nickel Acetate	5.0	n/a	150



South Coast Air Quality Management District
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PERMIT TO OPERATE

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Permit No.
G38175
A/N 521730

CONTINUATION OF PERMIT TO OPERATE

7. A log concerning the operation of the equipment shall be kept on file for a minimum of five years. The past two years' records shall be kept on site, and shall be made available to any District representative upon request. This log shall contain the following information:
- A. The concentration, in percent by weight of each chemical in each tank identified in Condition No. 6 above, and as determined each month from the estimated operating losses and replenishment during process operation. The concentration of each chemical in each tank shall also be recorded in this log each time the tank solution is replaced.
 - B. Safety Data Sheets (SDS) for all materials charged to each process tank at this facility.
 - C. Records required by conditions of this permit.

NOTICE

IN ACCORDANCE WITH RULE 206, THIS PERMIT TO OPERATE OR COPY SHALL BE POSTED ON OR WITHIN 8 METERS OF THE EQUIPMENT.

THIS PERMIT DOES NOT AUTHORIZE THE EMISSION OF AIR CONTAMINANTS IN EXCESS OF THOSE ALLOWED BY DIVISION 26 OF THE HEALTH AND SAFETY CODE OF THE STATE OF CALIFORNIA OR THE RULES OF THE AIR QUALITY MANAGEMENT DISTRICT. THIS PERMIT CANNOT BE CONSIDERED AS PERMISSION TO VIOLATE EXISTING LAWS, ORDINANCES, REGULATIONS OR STATUTES OF OTHER GOVERNMENT AGENCIES.

EXECUTIVE OFFICER

Dorris M. Bailey

By Dorris M. Bailey/jv01
11/19/15

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EXHIBIT B



South Coast Air Quality Management District
21865 Copley Drive, Diamond Bar, CA 91765-4178
PERMIT TO OPERATE

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Permit No.
G49944
A/N 565899

This initial permit must be renewed ANNUALLY unless the equipment is moved, or changes ownership.
If the billing for the annual renewal fee (Rule 301.f) is not received by the expiration date, contact the District.

Legal Owner
or Operator:

REAL PLATING
1245 W 2ND ST
POMONA, CA 91766-1310

ID 152443

Equipment Location: 1245 W 2ND ST, POMONA, CA 91766-1310

Equipment Description :

Zinc Plating Line Consisting of:

1. Tank No. 33, Electrocleaning, Sodium Carbonate, Sodium Gluconate, Sodium Hydroxide, Rectified, Heated, Covered.
2. Tank No. 35, Pickling, Hydrochloric Acid, Unheated, Covered.
3. Tank No. 10, Chloride Zinc Plating, Boric Acid, Potassium Chloride, Zinc Chloride, with One Maximum 300-ampere Rectifier, Air Sparged, Unheated.
4. Tank No. 11, Chloride Zinc Plating, Boric Acid, Potassium Chloride, Zinc Chloride, with One Maximum 300-ampere Rectifier, Air Sparged, Unheated.
5. Tank No. 38, Alkaline Zinc Plating, Sodium Hydroxide, Zinc Oxide, Rectified, Air Sparged, Unheated.
6. Tank No. 42, Alkaline Zinc Plating, Sodium Hydroxide, Zinc Oxide, Rectified, Air Sparged, Unheated.
7. Tank No. 29, Passivation, Ammonium Bifluoride, Chrome Nitrate, Nitric Acid, Sulfuric Acid, Unheated, Covered.
8. Associated Loading, Unloading, Dragout, and Rinse Tanks, Heated and Unheated.

Conditions :

1. Operation of this equipment shall be conducted in accordance with all data and specifications submitted with the application under which this permit is issued unless otherwise noted below.
2. This equipment shall be properly maintained and kept in good operating condition at all times.
3. This permit is subject to the following requirements:

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PERMIT TO OPERATE

- A. This tank shall be clearly identified and labeled with appropriate tank no. as designated in the equipment description. The identification and/or labeling of this tank shall be directly affixed to the tank and be easily readable.
 - B. This tank shall only contain the chemicals and compounds specifically identified in the equipment description of this permit. No chemical compounds listed in Rule 1401, Table 1 "Toxic Air Contaminants" with an effective date of September 10, 2010, or earlier, other than those included in the equipment description of this permit shall be used in this equipment.
 - C. Air sparging, rectification and/or heating shall not be conducted except in tanks where these operations are specifically identified in the equipment description. Removal of such equipment shall not constitute a modification for permitting purposes.
4. An identification tag or label shall be affixed to all rectifiers in a permanent and conspicuous position. The identification marker shall be maintained in legible condition and shall contain the following information:
 - A. Rectifier identification number
 - B. Maximum rectifier amperage
 - C. Identification number(s) of tank(s) served by the rectifier.
5. The following tanks shall be equipped with continuous recording, non-resettable, totalizing ampere-hour meters, which operate on the electrical power line(s) connected to each tank. A separate meter shall be hard-wired for each rectifier.
 - A. Electrocleaning Tank No. 33
 - B. Alkaline Zinc Plating Tank no. 38
 - C. Alkaline Zinc Plating Tank no. 42
6. The owner/operator shall inspect and maintain the ampere-hour meters according to the manufacturer's recommendations.
7. The total ampere-hours of current applied to the Electrocleaning Tank No. 33 at this facility, as measured by the ampere-hour meters, shall not exceed 2,620,800 ampere-hours in any one calendar year.
8. The total ampere-hours of current applied to the Alkaline Zinc Plating Tank Nos. 38 and 42 at this facility, as measured by the ampere-hour meters, shall not exceed 1,092,000 ampere-hours each in any one calendar year.
9. The owner/operator shall record ampere-hour usage for Electrocleaning Tank No. 33, and Alkaline Zinc Plating Tank Nos. 38 and 42, the cumulative ampere-hour readings for each month of the calendar year and the total ampere-hours to date in the given calendar year shall be recorded for each tank.
10. The concentration of chemicals used in the tanks shall not exceed the following:

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PERMIT TO OPERATE

Page 3
Permit No.
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Tand No.	Chemical	Weight Percent
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10	Zinc Chloride	17.50
10	Potassium Chloride	6.70
10	Boric Acid	1.59
11	Zinc Chloride	17.50
11	Potassium Chloride	6.70
11	Boric Acid	1.59
29	Nitric Acid	4.5
29	Chrome Nitrate	0.75
29	Ammonium Bifluoride	0.75
29	Sulfuric Acid	0.75
33	Sodium Hydroxide	5.20
33	Sodium Carbonate	1.92
33	Sodium Gulconate	0.36
35	Hydrochloric Acid	20.0
38	Sodium Hydroxide	16.0
38	Zinc Oxide	2.0
42	Sodium Hydroxide	19.4
42	Zinc Oxide	2.0

11. The temperature of operation of the Electrocleaning Tank No. 33 shall not exceed 190 degrees Fahrenheit.
12. Temperature gauges shall be installed to accurately measure the operating temperature of the process tanks that are heated.
13. Safety Data Sheets for all raw materials used at this facility shall be kept current, and shall be made available to any District representative upon request.
14. A log to record the operation of this equipment shall be kept on file for at least five years. The past two years records shall be kept on site, and shall be made available to any District representative upon request. This log shall contain, at a minimum, the following information:
 - A. The records required by the conditions of this permit
 - B. At least once a month, the concentration, in percent by weight, of each chemical in each tank as determined by laboratory analysis, or from the estimated operating losses and replenishment during process operation.

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21865 Copley Drive, Diamond Bar, CA 91765-4178

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A/N 565899

PERMIT TO OPERATE

NOTICE

In accordance with Rule 206, this Permit to Operate or copy shall be posted on or within 8 meters of the equipment.

This permit does not authorize the emission of air contaminants in excess of those allowed by Division 26 of the Health and Safety Code of the State of California or the applicable Rules and Regulations of the South Coast Air Quality Management District (SCAQMD). This permit cannot be considered as permission to violate existing laws, ordinances, regulations or statutes of other government agencies.

Executive Officer

A handwritten signature in black ink, appearing to read "L. Tisopulos".

BY LAKI TISOPULOS, PhD/JV01
12/29/2017

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